## TROUTMAN PEPPER LOCKE LLP

Justin D. Balser justin.balser@troutman.com 100 Spectrum Center Drive, Suite 1500 Irvine, California 92618

Telephone: 949.622.2700 Facsimile: 949.622.2739

Attorneys for Respondent Nationstar Mortgage LLC d/b/a Mr. Cooper

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

CHARLYN GREENE,

Petitioner,

v.

NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER, et al., MTC FINANCIAL, INC., d/b/a TRUSTEE CORPS, et al., TRUSTEE CORPS., et al., and all persons unknown, claiming any legal or equitable right, title, estate, lien, or interest in the property described in the claim adverse to Petitioner's title, or any cloud upon Petitoner's title thereto. Doe's 1 through 25,

Respondent(s).

Case No.: 1:24-cv-00087-CRH

MEMORANDUM IN SUPPORT OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER'S COMBINED OPPOSITION TO PETITIONER'S MOTION TO STRIKE ALL FILINGS BY AND MOTION TO LIFT STAY [DOC. NOS. 62, 63]

Nationstar Mortgage LLC d/b/a Mr. Cooper hereby responds to Petitioner Charlyn Greene's motion to strike all of filings and to lift stay, Doc. Nos. 62 and 63.

Petitioner Charlyn Greene again moves to strike all Nationstar's pleadings because they were filed by its attorney. She also asks this Court to lift the stay on filings pending ruling on Nationstar's motion to dismiss. Both motions should be denied.

Petitioner filed two previous motions to strike Nationstar's filings on similar grounds. *See* Doc. Nos. 56, 60. Both were denied on December 2, 2024. Doc. No. 61. The instant motion offers nothing new and should be denied.

The motion to lift the stay imposed by the Court should also be denied. Petitioner raised her same arguments in previous filings and Nationstar's fully briefed motion to dismiss addresses them. The fact Petitioner continues to demand the Court enter judgment based on her submission to Nationstar of false and fraudulent documents purporting to satisfy her mortgage loan demonstrates exactly why the stay should not be lifted and the matter dismissed.

Dated this 11th day of April 2025.

## TROUTMAN PEPPER LOCKE LLP

/s/ Justin D. Balser

Justin D. Balser 100 Spectrum Center Drive, Suite 1500 Irvine, California 92618

Telephone: 949.622.2700

Email: justin.balser@troutman.com

Attorneys for Respondent Nationstar Mortgage LLC d/b/a Mr. Cooper

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 11, 2025, I caused to be served a true and correct copy of the foregoing MEMORANDUM IN SUPPORT OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER'S COMBINED OPPOSITION TO PETITIONER'S MOTION TO STRIKE ALL FILINGS BY AND MOTION TO LIFT STAY [DOC. NOS. 62, 63] in the following manner:

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, to the parties listed below at their last-known mailing addresses, on the date above written:

Charlyn Greene P.O. Box 275 Napoleon, ND 58561

(ELECTRONIC FILING SERVICE) document was electronically filed on the date hereof and served through the Notice of Electronic automatically generated by the Court's facilities to those on the Court's Master Service List as follows:

Jason B Tingle jtingle@hwmlawfirm.com	Tyler S Wirick tylerw@hwmlawfirm.com
3 6	

(EMAIL) By emailing a true and correct copy of the above-referenced document to the person(s) listed below:

Charlyn Green csgreene@protonmail.com

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Evelyn Duarte
An employee of
Troutman Pepper Locke LLP